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February 11, 2022 APPLICATION GRANTED  
SO ORDERED

*Via ECF*

2/13/22   
John G. Koeltl, U.S.D.J.

The Honorable John G. Koeltl, U.S.D.J.  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
Courtroom 14A  
500 Pearl St.  
New York, NY 10007-1312

**Re: Two Hands IP LLC v. Two Hands America, Inc. and ABC Corps. 1-100**  
**Civ. Act. No. 1:21-cv-03855-JGK-SDA**

Dear Judge Koeltl:

As Your Honor is aware, this firm is counsel to Plaintiff Two Hands IP LLC ("Plaintiff") in the above-referenced matter. We write jointly with counsel for Defendant Two Hands America, Inc. ("Two Hands America") in response to the Court's February 2, 2022 Order (ECF No. 37) requesting a status update. The parties also write to respectfully request that this action be stayed for an additional 60 days pending the outcome of continued mediation and settlement discussions.

On October 11, 2021, Plaintiff filed an interlocutory appeal of this Court's order denying Plaintiff's Motion for a Preliminary Injunction. ECF No. 30. During the pendency of that appeal, the parties engaged in an initial mediation through the Second Circuit's Civil Appeals Mediation Program ("CAMP"). No. 21-2538, ECF No. 16 (2d Cir. 10/26/2021). At the initial CAMP mediation on December 2, the parties stipulated to hold the appeal in abeyance while they engaged in additional mediation and settlement negotiations. No. 21-2538, ECF No. 31 (2d Cir. 12/10/2021). The next CAMP mediation session took place on January 12, 2022. No. 21-2538, ECF No. 30 (2d Cir. 12/2/2021), during which the parties agreed to continue to hold the appeal in abeyance while settlement discussions, including the negotiation of a formal settlement agreement, continue. A status conference with the CAMP mediator is scheduled for February 17, 2022. No. 21-2538, ECF No. 41 (2d Cir. 1/12/2022). The current appeal reinstatement date is February 18, 2022. No. 21-2538, ECF Nos. 46 and 50 (2d Cir. 1/20/2022 and 1/21/2022). The parties continue to engage in productive settlement discussions and believe that, with the help of the Second Circuit's mediator, they may amicably resolve this lawsuit.

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Accordingly, while they engage in continued mediation and settlement discussions, the parties jointly seek an additional 60-day stay of this case to minimize the unnecessary use of party and judicial resources. The parties will provide an update to the Court by the earlier of: (i) one week prior to the expiration of this stay (if granted); (ii) ten days after dismissal of the appeal (in which case the status update may take the form of a stipulation of dismissal); or (iii) ten days after the appeal is reinstated.

Counsel for Two Hands America, Armin Ghiam, reviewed this letter prior to filing.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Abigail J. Remore*

Abigail J. Remore

AJR:

cc: All counsel of record via ECF